

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
AUBREY DRAKE GRAHAM,	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 1:25-cv-399-JAV
	:	
UMG RECORDINGS, INC.,	:	
	:	
Defendant.	:	
	:	
	-X	

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF
PLAINTIFF’S OMNIBUS LETTER MOTION TO COMPEL DEFENDANT UMG
RECORDINGS, INC.**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this Court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiff Aubrey Drake Graham (“Plaintiff”) in the above-captioned action.
2. I submit this declaration in support of Plaintiff’s Letter Motion to Compel Defendant UMG Recordings, Inc. (“UMG”) to produce documents responsive to Plaintiff’s Requests for Production Numbers 11, 12, 29, 30, 31, 33, and to produce an unredacted version of its recording agreement with Kendrick Lamar Duckworth responsive to Request Number 1.
3. Attached as Exhibit 1 is a true and correct copy of Plaintiff’s first set of Requests for Production to Defendant dated March 10, 2025.
4. Attached as Exhibit 2 is a true and correct copy of Plaintiff’s letter to Defendant dated April 22, 2025.

5. Attached as Exhibit 3 is a true and correct copy of an email from Defendant to Plaintiff dated May 12, 2025.

6. Attached as Exhibit 4 is a true and correct copy of Plaintiff's second set of Requests for Production to Defendant dated June 3, 2025.

7. Attached as Exhibit 5 is a true and correct copy of a redacted contract between Kendrick Lamar and Interscope Records designated as Attorney's Eyes Only designation produced by Defendant on June 24, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2025.

/s/ M. Annie Houghton-Larsen
M. Annie Houghton-Larsen
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